

EXHIBIT C

**LOUISE GOLDSTON
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<p>1 IN THE UNITED STATES DISTRICT COURT FOR THE</p> <p>2 SOUTHERN DISTRICT OF WEST VIRGINIA</p> <p>3 AT BECKLEY</p> <p>4 *****</p> <p>5 MATTHEW GIBSON,</p> <p>6 Plaintiff,</p> <p>7 vs. CIVIL ACTION NO.</p> <p>8 5:21-cv-00181</p> <p>9 LOUISE E. GOLDSTON, Individually,</p> <p>10 COUNTY COMMISSION OF RALEIGH</p> <p>11 COUNTY, a political subdivision,</p> <p>12 JEFF MCPHAKE, Individually,</p> <p>13 BRIAN WHITE, Individually,</p> <p>14 BOBBY STUMP, Individually,</p> <p>15 KYLE LUSK, Individually,</p> <p>16 Defendants.</p> <p>17 *****</p> <p>18 Deposition of LOUISE E. GOLDSTON taken by</p> <p>19 the Plaintiff under the Federal Rules of Civil</p> <p>20 Procedure in the above-entitled action, pursuant to</p> <p>21 notice, before Bradford L. Cooper, a Notary Public,</p> <p>22 at Pullin, Fowler, Flanagan, Brown, and Poe, PLLC,</p> <p>23 252 George Street, Beckley, West Virginia, on the</p> <p>24 1st day of March, 2022.</p> <p>REALTIME REPORTERS, a Huseby Company</p> <p>BRADFORD L. (Brad) COOPER, Notary Public</p> <p>713 Lee Street</p> <p>Charleston, WV 25301</p> <p>(304) 344-8463</p> <p>realtime reporters.net</p>	<p>1 EXAMINATION INDEX</p> <p>2</p> <p>3 BY MR. BRYAN 6</p> <p>4</p> <p>5</p> <p>6</p> <p>7 EXHIBIT INDEX</p> <p>8 Exhibit 1 Louise Goldston Judicial 6</p> <p>Disciplinary Proceeding</p> <p>9</p> <p>10 Exhibit 2 Public Admonishment of the 23</p> <p>Honorable Eric Shuck, Judge of the</p> <p>13th Family Court Circuit</p> <p>11</p> <p>12 Exhibit 3 Louise Goldston Judicial 43</p> <p>Disciplinary Counsel Agreement</p> <p>13 Exhibit 4 Formal Statement of Charges 44</p> <p>14 Exhibit 5 Transcript of Judicial Board 56</p> <p>Hearing of Louise Goldston dated</p> <p>15 January 15, 2021</p> <p>16 Exhibit 6 Audio Recording Recorded by 65</p> <p>Plaintiff Matthew Gibson</p> <p>17</p> <p>18 Exhibit 7 Video of the Incident at the Home 82</p> <p>of Matthew Gibson</p> <p>19 Exhibit 8 Divorce Hearing Video dated April 84</p> <p>19, 2018</p> <p>20</p> <p>21 Exhibit 9 Recording of Kyle Lusk at Hearing 90</p> <p>re: Search</p> <p>22 Exhibit 10 Voicemail Recording of Kyle Lusk 95</p> <p>23</p> <p>24</p>	<p>1 APPEARANCES:</p> <p>2 APPEARING FOR THE PLAINTIFF:</p> <p>3 John H. Bryan, Esquire</p> <p>4 JOHN H. BRYAN, ATTORNEYS AT LAW</p> <p>411 Main Street</p> <p>5 P.O. Box 366</p> <p>Union, West Virginia 24983</p> <p>6 jhb@johnbryanlaw.com</p> <p>7</p> <p>8 APPEARING FOR THE DEFENDANTS STUMP, MCPHAKE, AND</p> <p>9 WHITE:</p> <p>10 Kevin J. Robinson, Esquire</p> <p>PULLIN, FOWLER, FLANAGAN, BROWN,</p> <p>11 AND POE, PLLC</p> <p>252 George Street</p> <p>Beckley, West Virginia 25801</p> <p>12</p> <p>13 APPEARING FOR THE DEFENDANT, LOUISE E. GOLDSTON:</p> <p>14 Jennifer E. Tully, Esquire</p> <p>BAILEY & WYANT, PLLC</p> <p>500 Virginia Street East, Suite 600</p> <p>15 P.O. Box 3710</p> <p>Charleston, West Virginia 25337-3710</p> <p>16</p> <p>17 APPEARING FOR THE SUPREME COURT OF APPEALS OF WEST</p> <p>18 VIRGINIA:</p> <p>19 Bradley Schmalzer, Esquire (via telephone)</p> <p>20 Julianne Wisman, Esquire (via telephone)</p> <p>21</p> <p>22 ALSO PRESENT:</p> <p>23 Bobby Stump, Defendant</p> <p>24 Matthew Gibson, Plaintiff</p> <p>J.R. Morgan</p>	<p>1 OBJECTION INDEX</p> <p>2 BY MS. TULLY 13</p> <p>BY MS. TULLY 13</p> <p>3 BY MS. TULLY 24</p> <p>BY MS. TULLY 25</p> <p>4 BY MS. TULLY 26</p> <p>BY MS. TULLY 26</p> <p>5 BY MS. TULLY 28</p> <p>BY MS. TULLY 45</p> <p>6 BY MS. TULLY 45</p> <p>BY MS. TULLY 51</p> <p>7 BY MS. TULLY 52</p> <p>BY MS. TULLY 53</p> <p>8 BY MS. TULLY 53</p> <p>BY MS. TULLY 54</p> <p>9 BY MS. TULLY 54</p> <p>BY MS. TULLY 54</p> <p>10 BY MS. TULLY 57</p> <p>BY MS. TULLY 58</p> <p>11 BY MS. TULLY 62</p> <p>BY MS. TULLY 75</p> <p>12 BY MS. TULLY 76</p> <p>BY MS. TULLY 79</p> <p>13 BY MR. ROBINSON 91</p> <p>BY MS. TULLY 94</p> <p>14 BY MS. TULLY 96</p> <p>BY MS. TULLY 98</p> <p>15 BY MS. TULLY 99</p> <p>BY MS. TULLY 100</p> <p>16 BY MS. TULLY 103</p> <p>BY MS. TULLY 103</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>

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<p style="text-align: right;">Page 9</p> <p>1 they used it.</p> <p>2 A. They used it. I disagree with it.</p> <p>3 Q. The Supreme Court found that you led a</p> <p>4 search of the homeowner's residence, not a judicial</p> <p>5 view.</p> <p>6 A. That's what they found.</p> <p>7 Q. The West Virginia Supreme Court further</p> <p>8 found that in so doing, that you "exercised</p> <p>9 executive powers forbidden to you under the West</p> <p>10 Virginia Constitution". Is that true?</p> <p>11 A. That is what they found.</p> <p>12 Q. Okay. Do you disagree with that?</p> <p>13 A. Yes.</p> <p>14 Q. The Court further held in that Opinion that</p> <p>15 you did not go to the property to observe the</p> <p>16 ex-husband's house but that you went there to</p> <p>17 locate and seize certain of its contents:</p> <p>18 Pictures, DVDs, and other items of personal</p> <p>19 property. Is that true?</p> <p>20 A. That is true.</p> <p>21 Q. Do you disagree with the Supreme Court's</p> <p>22 holding?</p> <p>23 A. Which holding?</p> <p>24 Q. That you went to the house to locate and</p>	<p style="text-align: right;">Page 11</p> <p>1 Court found but you disagree.</p> <p>2 A. I think I've already answered that but yes.</p> <p>3 I did not go there to locate them. I went there to</p> <p>4 allow Mrs. Gibson to retrieve the items she had</p> <p>5 been awarded.</p> <p>6 Q. Did you --</p> <p>7 A. And Mister -- and only the items that</p> <p>8 Mr. Gibson had previously testified were still</p> <p>9 there.</p> <p>10 Q. Okay. But you -- you didn't know where</p> <p>11 they were inside his house, did you?</p> <p>12 A. I did not, and I did not look.</p> <p>13 Q. So they -- somebody had to locate them</p> <p>14 inside the house.</p> <p>15 A. That's correct.</p> <p>16 Q. Okay. And nobody asked Mr. Gibson to go in</p> <p>17 his house and bring the items outside.</p> <p>18 A. No.</p> <p>19 Q. You went in, right?</p> <p>20 A. I did.</p> <p>21 Q. And the bailiff -- your bailiff went in.</p> <p>22 A. He did.</p> <p>23 Q. Mrs. Gibson went in.</p> <p>24 A. She did.</p>
<p style="text-align: right;">Page 10</p> <p>1 seize certain contents - personal property - in the</p> <p>2 house.</p> <p>3 A. I disagree that I went there personally to</p> <p>4 locate them. I do agree that I went there to seize</p> <p>5 them.</p> <p>6 Q. And why do you -- why do you disagree that</p> <p>7 you went there to locate them?</p> <p>8 A. Because, as is clear on the tape taken by</p> <p>9 Officer McPeake, I did not look for nor try to</p> <p>10 locate anything. I asked Mrs. Gibson where those</p> <p>11 items that she was not given, as awarded in the</p> <p>12 order -- where they were located when she lived</p> <p>13 there. I told her to look there. She asked to</p> <p>14 look other places. I denied that request.</p> <p>15 So I did not attempt to locate anything.</p> <p>16 The things that she was awarded that were in the</p> <p>17 same place that they'd been when the couple lived</p> <p>18 there together, I allowed her to take.</p> <p>19 Q. However, the Supreme Court stated that "the</p> <p>20 record is clear that Judge Goldston went to the</p> <p>21 property to locate things, not simply to observe</p> <p>22 them." Right?</p> <p>23 A. That is what they found.</p> <p>24 Q. Okay. That's -- that's what the Supreme</p>	<p style="text-align: right;">Page 12</p> <p>1 Q. And Mr. Lusk went in.</p> <p>2 A. Yes.</p> <p>3 Q. To locate the items.</p> <p>4 A. Yes. I would say retrieve the items but --</p> <p>5 Q. In fact, the Supreme Court noted in their</p> <p>6 Opinion that when Mr. Gibson demanded a list of</p> <p>7 what you were seeking, you replied, "You have a</p> <p>8 list of everything attached to the order."</p> <p>9 And when he professed not to know where</p> <p>10 some of it's at, you replied, "Well, we're going to</p> <p>11 find it."</p> <p>12 A. I did.</p> <p>13 Q. Okay. So as the Supreme Court noted, you</p> <p>14 told Mr. Gibson that you would be going inside his</p> <p>15 house to find items.</p> <p>16 A. Correct.</p> <p>17 Q. But you disagree with the categorization of</p> <p>18 that is a search.</p> <p>19 A. That that is a search by me, yes.</p> <p>20 Q. You would admit that it's a search by</p> <p>21 somebody.</p> <p>22 A. Again, I told Mrs. Gibson she could look</p> <p>23 only in places where the items she had been awarded</p> <p>24 were located and that if they were not there she</p>

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<p style="text-align: right;">Page 17</p> <p>1 others inside his house. Is that true?</p> <p>2 A. Can you show me where that is?</p> <p>3 MS. TULLY: Where does it say that?</p> <p>4 THE DEPONENT: Right here.</p> <p>5 A. I would agree that he probably felt he had</p> <p>6 no choice, unless he wanted to be arrested.</p> <p>7 Q. Also referring to Page 4, the Court noted</p> <p>8 that you brought with you into Mr. Gibson's house</p> <p>9 "the ex-wife, the ex-wife's attorney, and</p> <p>10 personally supervised the search for and recovery</p> <p>11 of items." Is that true?</p> <p>12 A. That's true what they said. Again, I</p> <p>13 disagree with the word "search".</p> <p>14 Q. Also on Page 4, the Court noted that:</p> <p>15 "Several items were located and recovered,</p> <p>16 including photographs, yearbooks, DVDs, recipes,</p> <p>17 and a chainsaw." Is that true?</p> <p>18 A. That's correct.</p> <p>19 Q. And the Court noted that you "made no</p> <p>20 arrangements to record what went on inside the home</p> <p>21 or outside the home." Is that true?</p> <p>22 A. That is true. Can I speak to that?</p> <p>23 Q. Sure.</p> <p>24 A. The Supreme Court talks about, in this</p>	<p style="text-align: right;">Page 19</p> <p>1 A. Yes and no. There have been times when</p> <p>2 repairs or renovations to courtrooms were being</p> <p>3 made and I had them in jury rooms or conference</p> <p>4 rooms or that kind of thing. Those all occurred</p> <p>5 prior to my recording things on -- by video and</p> <p>6 then recording. Those were back in the days when I</p> <p>7 did it on cassette tape.</p> <p>8 Q. In fact, the Court noted in the Opinion</p> <p>9 that your bailiff had made his own cellphone</p> <p>10 recording inside Mr. Gibson's home.</p> <p>11 A. That's correct.</p> <p>12 Q. Were you aware of that at the time that</p> <p>13 Deputy McPeake was filming with his cellphone?</p> <p>14 A. No.</p> <p>15 Q. When did you first find out about that?</p> <p>16 A. When I got back to the office, he sent it</p> <p>17 to me on my phone.</p> <p>18 Q. So he provided that directly to you?</p> <p>19 A. Yes.</p> <p>20 Q. So when he testified that he did not</p> <p>21 provide that directly to you, that was incorrect?</p> <p>22 A. He was mistaken.</p> <p>23 Q. And when he sent you that video, what did</p> <p>24 you do?</p>
<p style="text-align: right;">Page 18</p> <p>1 Opinion, that I did not take a court reporter with</p> <p>2 me. I do not have a court reporter. That's why it</p> <p>3 has always been my practice, and Rule 8 of the West</p> <p>4 Virginia Rules of Practice and Procedure for Family</p> <p>5 Courts specifically states that I am the only one</p> <p>6 who has the authority to film that -- to record</p> <p>7 those proceedings.</p> <p>8 So that -- that is why when we returned to</p> <p>9 the home -- to the courtroom, I made every effort</p> <p>10 to set forth everything that happened at the house</p> <p>11 and gave both Mr. Gibson and Mr. Lusk an</p> <p>12 opportunity to add to, detract from, or correct</p> <p>13 anything that I said that had happened at the</p> <p>14 scene.</p> <p>15 But I have no way to record those</p> <p>16 proceedings.</p> <p>17 Q. How do you usually record proceedings?</p> <p>18 A. With a computer.</p> <p>19 Q. And that takes place in your courtroom?</p> <p>20 A. Yes.</p> <p>21 Q. Other than these so-called visits over the</p> <p>22 course of your 20 years as a family court judge,</p> <p>23 did you ever have proceedings anywhere else, other</p> <p>24 than the courtroom or inside a litigant's home?</p>	<p style="text-align: right;">Page 20</p> <p>1 A. I sent it immediately to my case</p> <p>2 coordinator and I deleted it from my phone.</p> <p>3 Q. But you never realized, at the time at</p> <p>4 Mr. Gibson's house, that Deputy McPeake was</p> <p>5 recording?</p> <p>6 A. No.</p> <p>7 Q. And you didn't ask him to record at the</p> <p>8 house?</p> <p>9 A. No.</p> <p>10 Q. Had he been with you on prior visits to</p> <p>11 litigants' homes?</p> <p>12 A. No.</p> <p>13 Q. So that was the first for McPeake?</p> <p>14 A. Yes.</p> <p>15 Q. So the Supreme Court Opinion was accurate</p> <p>16 when it stated that you believed that McPeake</p> <p>17 "making the recording was improper and that you</p> <p>18 told him not to do it again"?</p> <p>19 A. Yes. I have since reviewed Rule 8 and do</p> <p>20 now realize that I have the authority to authorize</p> <p>21 somebody to record it but I did not realize that at</p> <p>22 the time.</p> <p>23 Q. Do you still believe that Rule 8, or any</p> <p>24 other rule, authorizes you told proceedings in the</p>

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<p style="text-align: right;">Page 57</p> <p>1 voluntary?</p> <p>2 A. Yes.</p> <p>3 Q. And what was your answer --</p> <p>4 A. Yes.</p> <p>5 Q. -- during that hearing?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. Do you recall whether that testimony</p> <p>8 was taken under oath?</p> <p>9 A. To my knowledge, it was. Yes.</p> <p>10 Q. And was your testimony truthful that day?</p> <p>11 A. Yes.</p> <p>12 MS. TULLY: She's not denied that this</p> <p>13 is her signature on the agreement.</p> <p>14 MR. BRYAN: Right. But she's denied</p> <p>15 that -- she says she was coerced and she testified</p> <p>16 during that hearing that she voluntarily entered</p> <p>17 that agreement, knowingly.</p> <p>18 A. With the knowledge that I had at the time,</p> <p>19 yes.</p> <p>20 BY MR. BRYAN:</p> <p>21 Q. Okay. So at the time you entered the</p> <p>22 agreement, you did so knowingly, voluntarily, and</p> <p>23 intelligently, right?</p> <p>24 MS. TULLY: Objection. Asked and</p>	<p style="text-align: right;">Page 59</p> <p>1 the house, in that we were talking about stuff that</p> <p>2 he testified under oath were still at the house.</p> <p>3 But if I had to do it again, I would say,</p> <p>4 "We are going to your house to get those items."</p> <p>5 And, quite frankly, I would have made it</p> <p>6 more clear to him that I was not doing it</p> <p>7 punitively to him, but I did not want to put</p> <p>8 Mr. Gibson in jail for not returning those items.</p> <p>9 He's a corrections officer. I did not</p> <p>10 think he would be treated well if he went to jail,</p> <p>11 and in my mind, if we could just go get those items</p> <p>12 that he admitted were there, that he admitted she</p> <p>13 was awarded, then that would solve everybody's</p> <p>14 problem.</p> <p>15 He would not be able to say that Ms. Gibson</p> <p>16 destroyed the items after she got them. Ms. Gibson</p> <p>17 would not then be able to say that he destroyed or</p> <p>18 he damaged the items after we retrieved them. It</p> <p>19 was the -- in my mind, it was the fairest, most</p> <p>20 efficient way to resolve the case.</p> <p>21 Q. So what was your mistake?</p> <p>22 A. Not setting forth that clearly on the</p> <p>23 record.</p> <p>24 Q. Is that it?</p>
<p style="text-align: right;">Page 58</p> <p>1 answered.</p> <p>2 Q. But later changed your mind.</p> <p>3 A. I didn't change my mind. I learned more</p> <p>4 about the law and realized that some of those</p> <p>5 canons I do not believe were violated.</p> <p>6 Q. Of course, the Supreme Court rejected your</p> <p>7 --</p> <p>8 MS. TULLY: Objection.</p> <p>9 Q. -- your belief, right?</p> <p>10 A. Obviously.</p> <p>11 Q. Okay. So rather than saying you were</p> <p>12 coerced, wouldn't it be more accurate to say that</p> <p>13 you had regret?</p> <p>14 A. I think it would be more accurate to say</p> <p>15 that I think I made a mistake.</p> <p>16 Q. As we sit here today, do you believe that</p> <p>17 you made any mistakes on March 4th, 2020 when you</p> <p>18 visited Mr. Gibson's home?</p> <p>19 A. Yes.</p> <p>20 Q. And what -- what mistakes did you make?</p> <p>21 A. One mistake I think I made was I should</p> <p>22 have informed Mr. Gibson before we left, while we</p> <p>23 were going to his house. I could not imagine at</p> <p>24 the time that he did not know why we were going to</p>	<p style="text-align: right;">Page 60</p> <p>1 A. My mistake? That's all I can think of. I</p> <p>2 think -- well, I'm not going to volunteer.</p> <p>3 Q. No, that's okay. What?</p> <p>4 A. I think if I'd had a more experienced</p> <p>5 bailiff -- I can think of another mistake I made.</p> <p>6 If I'd had a more experienced bailiff that had done</p> <p>7 this with me before, that that bailiff would not</p> <p>8 have called for backup.</p> <p>9 I had not known Deputy McPeake had called</p> <p>10 for backup. I knew he had said something on the</p> <p>11 radio. I always kind of assume they're saying</p> <p>12 they're out of their vehicle or whatever.</p> <p>13 The other mistake I made was when I arrived</p> <p>14 there -- and I'm not saying he did it intentionally</p> <p>15 but Mr. Gibson immediately came toward me, making</p> <p>16 his motions, which he certainly was entitled to do</p> <p>17 but it rattled me a little bit and I did not notice</p> <p>18 all the other cars that were there.</p> <p>19 And had I had the chance to get my</p> <p>20 bearings, I would've had all those cars leave and</p> <p>21 all those people leave because, as you know, Family</p> <p>22 Court hearings are confidential, no one is allowed</p> <p>23 in the hearing except the parties and any</p> <p>24 witnesses. None of those other people had been</p>

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<p style="text-align: right;">Page 61</p> <p>1 called as witnesses.</p> <p>2 I did tell Ms. Gibson as we were leaving,</p> <p>3 if she had a vehicle that she did not believe she</p> <p>4 could fit the items that Mr. Gibson had admitted</p> <p>5 were there that her father could come for the sole</p> <p>6 purpose of hauling the items, but I would've</p> <p>7 immediately had my bailiff clear out all the other</p> <p>8 people because my experience is the more people you</p> <p>9 have there, the more dangerous and out of hand it</p> <p>10 can get.</p> <p>11 But I did not do that because I was</p> <p>12 immediately confronted with all these other</p> <p>13 motions, which I was happy to rule on but it did</p> <p>14 not give me the time I needed to assess the</p> <p>15 situation and do the safety things I normally -- or</p> <p>16 my bailiff normally would have done.</p> <p>17 Q. You would agree with me that your physical</p> <p>18 safety was never in jeopardy at any point at</p> <p>19 Mr. Gibson's house.</p> <p>20 A. I did not feel threatened. No. But as far</p> <p>21 as speculating what could've happened, I don't</p> <p>22 know.</p> <p>23 Q. Okay. Mr. Gibson never threatened you in</p> <p>24 any way, did he?</p>	<p style="text-align: right;">Page 63</p> <p>1 am sure can be perceived as a threat.</p> <p>2 Q. And had you ordered the arrest of</p> <p>3 Mr. Gibson, it would've been Deputy McPeake that</p> <p>4 made the arrest, right?</p> <p>5 A. I assume so, yes.</p> <p>6 Q. And, in fact, you wanted to make sure that</p> <p>7 bailiffs who traveled with you to the home -- homes</p> <p>8 of litigants had arrest powers.</p> <p>9 A. That's a misstatement. When I asked --</p> <p>10 because Deputy McPeake is a retired bailiff and</p> <p>11 came in under this statute, they had been supplying</p> <p>12 me with officers who were not certified.</p> <p>13 I asked -- one of my requirements, as I am</p> <p>14 entitled under the code, is to have a deputy with</p> <p>15 arrest powers. I have never arrested anybody at a</p> <p>16 scene. I have had people arrested in the courtroom</p> <p>17 or outside the courtroom for direct contempt of</p> <p>18 court. So I wanted a bailiff that if the courtroom</p> <p>19 got out of control, that person could effect an</p> <p>20 arrest. The two requests were not related.</p> <p>21 Q. At some point in Mr. Gibson's front yard,</p> <p>22 did you threaten to arrest any other third party,</p> <p>23 other than Mr. Gibson?</p> <p>24 A. Not to my memory, and I know what you're</p>
<p style="text-align: right;">Page 62</p> <p>1 A. No. As I said, he approached me quickly</p> <p>2 when I got out of the vehicle and that rattled me.</p> <p>3 Did it scare me? No.</p> <p>4 Q. And, to the contrary, you threatened</p> <p>5 Mr. Gibson with arrest, even though you knew he was</p> <p>6 a federal correctional officer.</p> <p>7 MS. TULLY: Object to form.</p> <p>8 A. Again, I did not just threaten him with</p> <p>9 arrest. I told him that I was instructing him to</p> <p>10 let us in the house so that we could retrieve the</p> <p>11 items and that that was an order of the Court. If</p> <p>12 he refused to do that, he would be held in contempt</p> <p>13 and one of the remedies for direct contempt of a</p> <p>14 court order is arrest.</p> <p>15 Q. And Deputy McPeake was present as your</p> <p>16 bailiff when you made these statements to</p> <p>17 Mr. Gibson.</p> <p>18 A. Correct.</p> <p>19 Q. Okay. And you were here when he testified</p> <p>20 a few days ago during his deposition.</p> <p>21 A. I was.</p> <p>22 Q. Okay. And I believe that he testified that</p> <p>23 he heard you threaten to arrest Mr. Gibson.</p> <p>24 A. I just said that I -- what I said, which I</p>	<p style="text-align: right;">Page 64</p> <p>1 talking about. Mr. Lusk pointed out to me that</p> <p>2 Mister -- and I didn't know she was his girlfriend</p> <p>3 -- that there was a woman at the top of the</p> <p>4 driveway recording.</p> <p>5 My memory is I said, "Stop recording.</p> <p>6 You're not allowed to record."</p> <p>7 I do not believe I threatened to arrest</p> <p>8 her.</p> <p>9 Q. She was at the top of Mr. Gibson's</p> <p>10 driveway.</p> <p>11 A. Correct.</p> <p>12 Q. And you're aware that that was somebody who</p> <p>13 was with Mr. Gibson.</p> <p>14 A. I assume so. I had never laid eyes on her</p> <p>15 before.</p> <p>16 Q. All right. Let me play some audio.</p> <p>17 MR. BRYAN: Which I have some</p> <p>18 electronic exhibits on this thumb drive and I'll</p> <p>19 provide that to the court reporter.</p> <p>20 MS. TULLY: Okay.</p> <p>21 Q. I think this would be Exhibit 6. If I</p> <p>22 click the right button here, this would be, I</p> <p>23 believe, the audio recorded by Mr. Gibson</p> <p>24 personally.</p>